



BellSouth Telecommunications, Inc.

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REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY

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May 18, 2001

VIA HAND DELIVERY

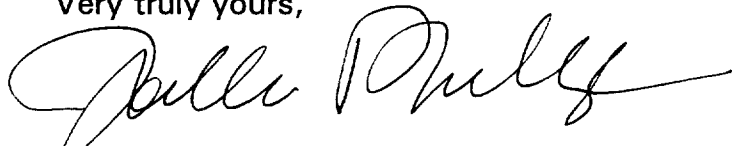
Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Docket to Establish Generic Performance Measurements, Benchmarks,
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Initial Objections to Data Requests Submitted by ATM/Discount Communications, Inc. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Joelle Phillips

JP/jej

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*

Docket No. 01-00193

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
INITIAL OBJECTIONS TO DATA REQUESTS SUBMITTED BY
ATM/DISCOUNT COMMUNICATIONS, INC.**

GENERAL OBJECTIONS

1. BellSouth Telecommunications, Inc. ("BellSouth") objects to each Request to the extent that it purports to impose upon it any obligations more onerous or far reaching than those provided for in the Tennessee Rules of Civil Procedure or any other applicable statute, rule, or regulation.

2. BellSouth objects to each request to the extent that it would require BellSouth to create or produce a document it does not maintain in the ordinary course of business.

3. BellSouth objects to each request to the extent it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

4. BellSouth has interpreted ATM/Discount's Requests to apply to BellSouth's regulated intrastate operations in Tennessee and will limit its answers accordingly.

SPECIFIC OBJECTIONS

Interrogatory No. 2: List the time and dates since January 1, 2000, when LENS was not operating or not operating properly. Include scheduled maintenance or repairs and provide copies of notices of such scheduled maintenance sent to customers.

Objection: BellSouth objects to the interrogatory on the basis that it is unduly broad and burdensome in its scope. The interrogatory seeks information spanning over 16 months. This time period is arbitrary, and compiling responsive information covering such an unnecessarily long time period will impose needless burden and expense on BellSouth. BellSouth further objects on the basis that the interrogatory is vague and ambiguous as to what is intended by the terms "operating" and "operating properly." Without waiving its objections and in an effort to be responsive, BellSouth will provide responsive information for the most recent six months.

Interrogatory No. 3: Provide a copy of every complaint, written or oral, received since January 1, 2000, regarding:

- a. LENS;
- b. the LCSC.

Objection: BellSouth objects to the interrogatory on the basis that it is unduly broad and burdensome in its scope. The interrogatory seeks information spanning over 16 months. This time period is arbitrary, and compiling responsive information covering such an unnecessarily long time period will impose needless

burden and expense on BellSouth. BellSouth further objects on the basis that the request is unduly broad to the extent it seeks information regarding complaints by customers other than ATM/Discount. BellSouth objects to providing information concerning communications between BellSouth and other CLECs because such communications contain proprietary information such as billing or business plan information kept confidential by such CLECs.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in dark ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks

Joelle Phillips

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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2001, a copy of the foregoing document was served on the following parties, via the method indicated:

☐ Hand
☒ Mail
☒ Facsimile
☐ Overnight

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A handwritten signature in cursive script, appearing to read 'Charles B. Welch', is written over a horizontal line.